



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

May 31, 2013

ROBERT J. SCHEELE, TREASURER  
GRAND TRAVERSE COUNTY DEMOCRATIC  
COMMITTEE  
1650 BARLOW ST SUITE #13 PO BOX 1532  
TRAVERSE CITY, MI 49685-1532

**Response Due Date**  
**07/05/2013**

IDENTIFICATION NUMBER: C00402842

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2012 - 09/30/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Schedule A supporting Line 11(a)(i) of your report discloses receipts identified as "contributions/memberships, misc." Please be advised that federal regulations require the itemization of all contributions from individuals/persons that aggregate greater than \$200 in the calendar year. Contributions from individuals/persons that aggregate \$200 or less need only be disclosed on Line 11(a)(ii) of the Detailed Summary Page.

Please clarify whether the receipts disclosed on Schedule A includes any contributions that aggregate greater than \$200 from an individual/person in the calendar year. If this is the case, please amend your report by itemizing the contributions from each individual/person on Schedule A. (11 CFR §104.3(a)(2))

2. Your reports for the election cycle contain(s) information disclosed on Schedule H4. Schedules H1, H2, H3, and H4 are used by committees which have separate federal and non-federal accounts to disclose the allocation of funds for expenditures between the two types of accounts. However, your reports do not show payments from a non-federal account on a Schedule H3, as would be customary for committees who allocate between accounts. If your committee does not maintain a non-federal account, all disbursements should be disclosed on a Schedule B and no allocation schedules filed. Please clarify

GRAND TRAVERSE COUNTY DEMOCRATIC COMMITTEE

Page 2 of 2

the procedures you are currently using to allocate shared expenses if any, and report future transactions appropriately.

Please note that transfers for allocated activity must be made within a 70-day time period: no more than 10 days before and no more than 60 days after payment to the vendor. (11 CFR §§106.6(e)(2) and 106.7(f)(2))

- Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. For your information and consideration when preparing future filings, contributions/transfers from State and local party committees should be properly disclosed on a separate Schedule A, supporting Line 12, not Line 11(b) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (2 U.S.C § 434(b) and FORM 3X Instructions)

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1144.

Sincerely,



Edward Ryan  
Senior Campaign Finance Analyst  
Reports Analysis Division